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| Gordon & Kees LLF 633 West Fifth Street, 52nd Floor Los Angeles, CA 90071 | | | | |
|---|----|---|--|--|
| | 1 | CALVIN E. DAVIS (SBN: 101640) | | |
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| | 4 | Telephone: (213) 576-5000 Facsimile: (213) 680-4470 | | |
| | 5 | Attorneys for Defendant | | |
| | 6 | SYNERGY HOMECARE FRANCHISING, LLC | | |
| | 7 | | | |
| | 8 | UNITED STATES DISTRICT COURT | | |
| | 9 | NORTHERN DISTRICT OF CALIFORNIA | | |
| | 10 | | | |
| | 11 | John Han, an individual, Alice Lai-Bitker, an |) CASE NO. 4:16-cv-03759-KAW | |
| | 12 | individual, Veris Eastbay Homecare, Inc., a California corporation |) STIPULATION AND (PROPOSED) | |
| | 13 | Plaintiffs, | ORDER TO CONTINUE DEFENDANT'S DEADLINE TO | |
| | 14 | vs. | FILE AN OPPOSITION TO PLAINTIFF'S MOTION FOR | |
| | 15 | Synergy Homecare Franchising, LLC, an Arizona | LEAVE TO AMEND THE COMPLAINT | |
| | 16 | limited liability company, |) | |
| | 17 | Defendant. |) _) | |
| | 18 | | | |
| | 19 | WHEREAS on January 13, 2017, plaintif | fs John Han, Alice Lai-Bitker, and Veris | |
| | 20 | Eastbay Homecare, Inc. (collectively, "Plaintiffs") filed a Motion for Leave to Amend the | | |
| | 21 | Complaint in the above-captioned matter; | | |
| | 22 | WHEREAS Plaintiffs' Motion for Leave to Amend the Complaint is currently scheduled | | |
| | 23 | to be heard on March 2, 2017; | | |
| | 24 | WHEREAS Defendant SYNERGY HomeCare Franchising, LLC's ("Defendant") | | |
| | 25 | deadline to file an Opposition to Plaintiff's Motion for Leave to Amend the Complaint is | | |
| | 26 | currently January 27, 2017; | | |
| | 27 | WHEREAS the primary handling attorney for | or Defendant on this matter, Gary Collis, left | |
| | 28 | Gordon & Rees LLP on January 24, 2017 and is no longer employed with the firm; | | |
| | | STIP AND (PROPOSED) ORDER TO CONTINUE DEADLINE TO FILE OPPOSITION TO MOTION FOR LEAVE TO AMEND THE COMPLAINT (CASE NO. 4:16-cv-03759-KAW) | | |

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| Gordon & Rees LLP 633 West Fifth Street, 52nd Floor Los Angeles, CA 90071 | 1 | WHEREAS counsel for Plaintiff has agreed to | o extend the deadline for Defendant to file | |
|--|----------|--|--|--|
| | 2 | its Opposition to Plaintiff's Motion for Leave to Amend the Complaint by one week, up to and | | |
| | 3 | including February 3, 2017; | | |
| | 4 | IT IS STIPULATED that Defendant's deadline to file its Opposition to Plaintiff's Motion | | |
| | 5 | for Leave to Amend the Complaint is continued to February 3, 2017. | | |
| | 6 | Dated: January 27, 2017 GOI | RDON & REES LLP | |
| | 7 | By | : /s/ Calvin E. Davis | |
| | 8 | | Calvin E. Davis Attorneys for Defendant | |
| | 10 | | SYNERGY HOMECARE FRANCHISING, LLC | |
| | 11 | Dated: January 27, 2017 MIL | ESTONE LEGAL, P.C. | |
| | 12 | | () 75 111 2 511 | |
| | 13 | By | (as authorized on 1/27/17) | |
| | 14 | | Philip Milestone Attorneys for Plaintiffs JOHN | |
| | 15 | | HAN, ALICE LAI-BITKER, and VERIS EASTBAY HOMECARE, INC. | |
| | 16 | | · | |
| | 17 | | | |
| | 18 | PURSUANT TO STIPULATION, IT IS SO ORDER | ED: | |
| | 19 20 | Dated: 1/31 , 2017 | Kandis Westmore | |
| | 21 | | ited States Magistrate Judge | |
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| 1122132/29622159 | 28 v.1 | | | |
| STIP AND (PROPOSED) ORDER TO CONTINUE DEADLINE TO FIL MOTION FOR LEAVE TO AMEND THE COMPLAINT (CASE NO. 4 | | | DEADLINE TO FILE OPPOSITION TO INT (CASE NO. 4:16-cv-03759-KAW) | |